

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
CENTRAL DIVISION**

ST. PAUL FIRE AND MARINE	)	
INSURANCE COMPANY,	)	
Plaintiff,	)	
	)	
vs.	)	No.: 4:11-cv-00504-JAJ-TJS
	)	
	)	<b>STATEMENT OF INTEREST</b>
PELLA CORPORATION AND PELLA	)	
WINDOWS AND DOORS, INC.,	)	
	)	
Defendants.	)	
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As required by Federal Rule of Civil Procedure 7.1, LR 7.1, and LR 81.c.-e, St. Paul Fire and Marine Insurance Company (“St. Paul”), Plaintiff in this case, provides the following information to the Court:

*(a) The following are the names of all associations, firms, partnerships, corporations, and other artificial entities that either are related to the plaintiff as a parent, subsidiary, or otherwise, or have a direct or indirect pecuniary interest in the plaintiff’s outcome in the case:*

1. The Travelers Companies, Inc.
2. St. Paul Fire and Casualty Insurance Company
3. St. Paul Mercury Insurance Company
4. St. Paul Guardian Insurance Company
5. Northbrook Holdings, Inc.
  - (a) St. Paul Protective Insurance Company
  - (b) Discover Property & Casualty Insurance Company
6. Promenade Partners, LLC
7. Chandler AZ Properties, LLC
8. United States Fidelity and Guaranty Company

- (a) Fidelity and Guaranty Insurance Company
- (b) Fidelity and Guaranty Insurance Underwriters, Inc.
- (c) Laurel Village Fidelity Realty, Inc.
  - (i) Laurel Village Joint Venture Partnership
    - (1) Laurel Village I Limited Partnership
    - (2) Laurel Village II Limited Partnership
    - (3) Laurel Village III Limited Partnership
    - (4) Laurel Village IV Limited Partnership
    - (5) Laurel Village Tower A Limited Partnership
    - (6) Laurel Village Tower B Limited Partnership
    - (7) Laurel Village Tower C Limited Partnership
    - (8) Laurel Village Swinford Limited Partnership
- (d) USF&G Retail Associates GP, Inc.
- (e) BMR Sports Properties, Inc.
- (f) Black Mountain Ranch Limited Partnership
- 9. USF&G Capital I
- 10. USF&G Capital III
- 11. Yonkers Financing, Corp.
- 12. Black Mountain Ranch Limited Partnership
- 13. 350 Market Street, LLC
- 14. MMI Capital Trust I
- 15. English Turn Realty Management, Inc.
- 16. English Turn Fidelity Realty, Inc.
  - (a) Fidelity English Turn Club General Partnership
- 17. English Turn Limited Partnership

18. Discover Specialty Insurance Company
19. Athena Assurance Company
20. St. Paul Surplus Lines Insurance Company
21. St. Paul Medical Liability Insurance Company
22. MFCM Limited
23. St. Paul Risk Management International Limited
24. Travelers Special Services Limited
25. UA Combined Investment Company Limited
26. Jago Dedicated Limited
27. Jago Capital Limited

*(b) With respect to each entity named in response to (a), the following describes its connection to or interest in the litigation, or both:*

1. The Travelers Companies, Inc. is the parent company of St. Paul.
2. St. Paul Fire and Casualty Insurance Company is a subsidiary of St. Paul.
3. St. Paul Mercury Insurance Company is a subsidiary of St. Paul.
4. St. Paul Guardian Insurance Company is a subsidiary of St. Paul.
5. Northbrook Holdings, Inc. is a subsidiary of St. Paul.
  - (a) St. Paul Protective Insurance Company is a subsidiary of Northbrook Holdings, Inc.
  - (b) Discover Property & Casualty Insurance Company is a subsidiary of Northbrook Holdings, Inc.
6. Promenade Partners, LLC is a subsidiary of St. Paul.
7. Chandler AZ Properties, LLC is a subsidiary of St. Paul.
8. United States Fidelity and Guaranty Company is a subsidiary of St. Paul.
  - (a) Fidelity and Guaranty Insurance Company is a subsidiary of United States Fidelity and Guaranty Company.

- (b) Fidelity and Guaranty Insurance Underwriters, Inc. is a subsidiary of United States Fidelity and Guaranty Company.
  - (c) Laurel Village Fidelity Realty, Inc. is a subsidiary of United States Fidelity and Guaranty Company.
    - (i) Laurel Village Joint Venture Partnership is controlled by Laurel Village Fidelity Realty, Inc.
      - (1) Laurel Village I Limited Partnership is controlled by Laurel Village Joint Venture Partnership.
      - (2) Laurel Village II Limited Partnership is controlled by Laurel Village Joint Venture Partnership.
      - (3) Laurel Village III Limited Partnership is controlled by Laurel Village Joint Venture Partnership.
      - (4) Laurel Village IV Limited Partnership is controlled by Laurel Village Joint Venture Partnership.
      - (5) Laurel Village Tower A Limited Partnership is controlled by Laurel Village Joint Venture Partnership.
      - (6) Laurel Village Tower B Limited Partnership is controlled by Laurel Village Joint Venture Partnership.
      - (7) Laurel Village Tower C Limited Partnership is controlled by Laurel Village Joint Venture Partnership.
      - (8) Laurel Village Swinford Limited Partnership is controlled by Laurel Village Joint Venture Partnership.
  - (d) USF&G Retail Associates GP, Inc. is a subsidiary of United States Fidelity and Guaranty Company.
  - (e) BMR Sports Properties, Inc. is a subsidiary of United States Fidelity and Guaranty Company.
  - (f) Black Mountain Ranch Limited Partnership is controlled by St. Paul and BMR Sports Properties, Inc.
9. USF&G Capital I is a subsidiary of St. Paul.
  10. USF&G Capital III is a subsidiary of St. Paul.
  11. Yonkers Financing, Corp. is a subsidiary of St. Paul.
  12. Black Mountain Ranch Limited Partnership is controlled by St. Paul.

13. 350 Market Street, LLC is a subsidiary of St. Paul.
14. MMI Capital Trust I is a subsidiary of St. Paul.
15. English Turn Realty Management, Inc. is a subsidiary of St. Paul.
16. English Turn Fidelity Realty, Inc. is a subsidiary of St. Paul.
  - (a) Fidelity English Turn Club General Partnership is controlled by English Turn Fidelity Realty and English Turn Realty Management, Inc.
17. English Turn Limited Partnership is controlled by St. Paul and English Turn Fidelity Realty, Inc.
18. Discover Specialty Insurance Company is a subsidiary of St. Paul.
19. Athena Assurance Company is a subsidiary of St. Paul.
20. St. Paul Surplus Lines Insurance Company is a subsidiary of St. Paul.
21. St. Paul Medical Liability Insurance Company is a subsidiary of St. Paul.
22. MFCM Limited is a subsidiary of St. Paul.
23. St. Paul Risk Management International Limited is a subsidiary of St. Paul.
24. Travelers Special Services Limited is a subsidiary of St. Paul.
25. UA Combined Investment Company Limited is controlled by St. Paul.
26. Jago Dedicated Limited is controlled by St. Paul.
27. Jago Capital Limited is controlled by St. Paul.

None of the above-named entities has a direct pecuniary interest in the outcome of this litigation.

Date: November 30, 2011

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of November 2011, I electronically filed the foregoing pleading with the Clerk of the Court and each of the following counsel of record via the Court's CM/ECF system:

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